

# Exhibit E

# HAYBER, McKENNA & DINSMORE, LLC

## EMPLOYEE RIGHTS ADVOCATES

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**VIA EMAIL ONLY TO: BENJAMIN.DAVIS@JACKSONLEWIS.COM**

August 16, 2023

Benjamin R. Davis  
Jackson Lewis P.C.  
75 Park Plaza, 4<sup>th</sup> Floor  
Boston, MA 02116  
Benjamin.Davis@jacksonlewis.com

**Re: Lauren Rollins v. R Street Institute**  
**Civil Action No.: 3:22-CV-30059**

Dear Attorney Davis,

Attached to the email accompanying this letter, please find Plaintiff's supplemental production of documents. Notwithstanding this supplemental production, Plaintiff maintains all objections raised in her initial responses to Defendant's Requests for Production of Documents.

In particular, the documents produced as LR001191-LR001259 are responsive to Defendant's Request for Production #22. As you know, Ms. Rollins' computer crashed after she was fired by R Street, so any additional versions of her resume or job search documents that were stored on that computer are no longer available to us to produce. The documents produced as LR001260-LR001278 are responsive to Requests for Production #28 and #29.

As to Defendant's request that she produce all treatment records for emotional distress, Plaintiff is maintaining her objection to Request #34 regarding any treatment records. Ms. Rollins has not waived the psychotherapy privilege by making a claim for emotional distress if her claim is limited to one of garden variety emotional distress damages. See, *Koppel v. Moses*, 2022 WL 17084324 (D. Mass Nov. 8, 2022); *Sorenson v. H & R Block, Inc.* 197 F.R.D. 199, 204 (D. Mass 2000) (*Vanderbilt v. Town of Chilmark*, 174 F.R.D. 225 (D. Mass 1997); *Sabree v. United Broth. of Carpenters & Joiners of America*, 126 F.R.D. 422, 426 (D. Mass 1989). Here, Ms. Rollins has not offered expert testimony as to the emotional distress claimed in this lawsuit, she does not claim to suffer from a specific diagnosis, and she is limiting her claim to one of garden variety emotional distress. As such, she has not waived the psychotherapy privilege.

Relative to Defendant's request that she supplement Requests #35-36 with records relative to an autism diagnosis and any related treatment, Plaintiff states that she has not sought any such adult diagnosis or treatment.

Letter to B. Davis

August 16, 2023

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Thank you.

Sincerely,

*/s/ Deborah L. McKenna*  
Deborah L. McKenna